

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DARETHA BRAZIEL, *et al.*, on behalf of herself and all others similarly situated,

Plaintiffs,

v.

THE CITY OF BENTON HARBOR, *et al.*,

Defendants.

Case No. 1:21-cv-00960-HYJ-PJG

Hon. Hala Y. Jarbou
Hon. Phillip J. Green

ORAL ARGUMENT REQUESTED

DEFENDANT MICHAEL O'MALLEY'S MOTION TO COMPEL FULL AND COMPLETE DISCOVERY RESPONSES FROM PLAINTIFFS

*****ORAL ARGUMENT REQUESTED*****

Defendant Michael O’Malley (“Mr. O’Malley”) moves pursuant to Fed. R. Civ. P. 26, 33, 34, 36, and 37 for an order compelling Plaintiffs to provide full and complete responses to Defendant Michael O’Malley’s First Set of Interrogatories, First Set of Requests for Admissions, First Set of Requests for Production of Documents, and Second Set of Requests for Production of Documents. Mr. O’Malley relies on the accompanying Brief in Support of this motion, which is being filed concomitantly and is incorporated herein by reference.

Respectfully submitted,

Dated: March 26, 2025

BODMAN PLC

By: /s/ J. Grant Semonin

Thomas J. Rheaume, Jr. (P74422)

Alexandra C. Markel (P81705)

Walter G. Pelton (P84442)

J. Grant Semonin (P86855)

6th Floor at Ford Field

1901 St. Antoine Street

Detroit, Michigan 48226

(313) 259-7777

trheaume@bodmanlaw.com

amarke1@bodmanlaw.com

wpelton@bodmanlaw.com

gsemonin@bodmanlaw.com

Attorneys for Defendant Michael O'Malley

CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2025, the foregoing document was filed with the Clerk of the Court via the Court's e-filing system which will give notice of such filing to all counsel of record.

Respectfully submitted,

Dated: March 26, 2025

BODMAN PLC

By: /s/ J. Grant Semonin

Thomas J. Rheaume, Jr. (P74422)

Alexandra C. Markel (P81705)

Walter G. Pelton (P84442)

J. Grant Semonin (P86855)

6th Floor at Ford Field

1901 St. Antoine Street

Detroit, Michigan 48226

(313) 259-7777

trheaume@bodmanlaw.com

amarke1@bodmanlaw.com

wpelton@bodmanlaw.com

gsemonin@bodmanlaw.com

Attorneys for Defendant Michael O'Malley